

### **REMARKS/ARGUMENTS**

In the Final Office Action mailed June 19, 2006, all pending claims 1-2, 4-6 and 8-21 were rejected under 35 U.S.C. 102(e) over U.S. Patent No. 6,714,918 to *Hillmer*. The Office maintains the rejection on the ground that “*Hillmer* teaches the step of recognizing a common load source account to associate transactions” (see Office Action, p.2 ln.21 to p. 3, ln. 2). Applicants respectfully traverse this rejection because: 1) the rejection inaccurately characterizes how transactions are associated in the claims, and 2) an accurate characterization of the claimed transaction associations is not taught in *Hillmer*.

Claim 1 includes a second analysis engine “operable to recognize a common load source account to associate the transactions and determine a transaction velocity from the first and second transaction information” (see Claim 1, lns. 13-15). The claim explicitly states that the first transaction information is “about a first transaction with the first stored value product” and the second transaction information is “about a second transaction with the second stored value product.” The claim further explicitly states that the second stored value product is “from a different issuer than an issuer of the first stored value product.” Thus, the first and second transaction information must be associated with stored value products from two different issuers.

The second analysis engine calculates a transaction velocity from the first and second transaction information when the engine recognizes that a common load source account (e.g., credit card) is associated with both transactions. Thus, the second analysis engine can calculate a transaction velocity from transactions associated with a common load source account, even when those transactions were conducted with stored value products from different issuers. This element is more specific than “recognizing a common load source account to associate transactions,” which does not require that the transactions be associated with stored value products from different issuers.

*Hillmer* does not disclose a fraud detection system that determines a transaction velocity by grouping transactions from different stored value products from different issuers that were associated with the same load source account. The passages of *Hillmer* cited by the Office all describe grouping transactions associated with the same stored value product issuer. While

the system in *Hillmer* recognized load source account information (e.g., checking or credit card information) there is no suggestion for using that information to associate transactions involving different stored value product issuers and calculating a transaction velocity from those transactions. Because *Hillmer* did not describe this explicit element of Claim 1, the claim is allowable over *Hillmer*.

Similarly, Claims 6 and 16 include elements of associating transactions using stored value products from different issuers that used a common load source account and calculating a transaction velocity from transactions associated in this manner. Thus, Claims 6, and 16, are also allowable over *Hillmer*.

Claims 2, 4-5, 8-15, and 17-21 depend from and include all the elements of either Claim 1, 6, or 16, respectively. Accordingly, for at least the reasons above, Claims 1-2, 4-6 and 8-21 are all allowable over *Hillmer*, and withdrawal of the rejection of the claims under 35 U.S.C. § 102(e) over the reference is requested.

### CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance and an action to that end is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 303-571-4000.

Respectfully submitted,

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